

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

Terrance Dixon, a/k/a “TA,”

Plaintiff,

v.

Joseph Antonio Cartagena p/k/a “Fat Joe,”
Peter “Pistol Pete” Torres,
Richard “Rich Player” Jospitre,
Erica Juliana Moreira,
Sneaker Addict Touring LLC,
Slate, Inc.,
Roc Nation, LLC,
John Does 1–10, and Jane Does 1–10, and
ABC Corporations 1–10,

Defendants.

No. 1:25-cv-05144 (JLR)

**NOTICE OF MOTION FOR
SANCTIONS**

(ORAL ARGUMENT REQUESTED)

PLEASE TAKE NOTICE, that upon the accompanying Memorandum of Law in Support, the exhibit thereto, and all papers and proceedings heretofore had herein, Defendant Roc Nation, LLC will move this Court before the Hon. Jennifer L. Rochon, by the undersigned counsel, at the Daniel Patrick Moynihan U.S. Courthouse, 500 Pearl St., New York, NY 10007, at a date and time to be determined by this Court, for an order dismissing Plaintiff’s Complaint and awarding attorneys’ fees and costs in this action pursuant to Rule 11 of the Federal Rules of Civil Procedure, 28 U.S.C. § 1927, and the Court’s inherent authority, and for such other and further relief the Court deems just and proper.

DATED: July 22, 2025
New York, New York

**QUINN EMANUEL URQUHART &
SULLIVAN, LLP**

By: /s/ Alex Spiro
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